

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMBAC ASSURANCE CORPORATION'S INFORMATIVE**  
**MOTION REGARDING SEPTEMBER 16-17, 2020, OMNIBUS HEARING**

Ambac Assurance Corporation (“Ambac”) hereby submits this informative motion in compliance with the *Order Regarding Procedures for September 16-17, 2020, Omnibus Hearing* [ECF No. 14202<sup>2</sup>], and respectfully states as follows:

1. Dennis Dunne and Atara Miller of Milbank LLP will appear telephonically at the September 16-17, 2020, Omnibus Hearing (the “Hearing”) on behalf of Ambac.

2. Mr. Dunne and Ms. Miller will speak in connection with the *Objection of Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and*

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>2</sup> “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

*Ambac Assurance Corporation to the Motion of the Commonwealth of Puerto Rico Pursuant to Bankruptcy Rule 9019 for an Order Approving Stipulation and Agreed Order (A) Allowing PRIFA BANs Guarantee Claim, (B) Authorizing Escrow of PRIFA Funds and (C) Directing the Dismissal of Litigation with prejudice [ECF No. 12699] and the Partial Joinder of Ambac Assurance Corporation to the Urgent Motion of Official Committee of Unsecured Creditors to Lift Stay to Allow Committee to Pursue Objection to GO Priority [ECF No. 13726] [ECF No. 14142].*

3. Mr. Dunne and Ms. Miller also reserve the right to be heard on any matter raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III cases, or the interests of Ambac.

WHEREFORE, Ambac respectfully requests that the Court take notice of the foregoing.

*[Remainder of Page Intentionally Omitted]*

Dated: September 13, 2020  
San Juan, Puerto Rico

**FERRAIUOLI LLC**

By: /s/ Roberto Cámara-Fuertes  
Roberto Cámara-Fuertes (USDC-PR No. 219002)  
Sonia Colón (USDC-PR No. 213809)  
221 Ponce de León Avenue, 5th Floor  
San Juan, PR 00917  
Telephone: (787) 766-7000  
Facsimile: (787) 766-7001  
Email: rcamara@ferraiuoli.com  
scolon@ferraiuoli.com

**MILBANK LLP**

By: /s/ Atara Miller  
Dennis F. Dunne (admitted *pro hac vice*)  
Atara Miller (admitted *pro hac vice*)  
Grant R. Mainland (admitted *pro hac vice*)  
John J. Hughes, III (admitted *pro hac vice*)  
55 Hudson Yards  
New York, NY 10001  
Telephone: (212) 530-5000  
Facsimile: (212) 530-5219  
Email: ddunne@milbank.com  
amiller@milbank.com  
gmainland@milbank.com  
jhughes2@milbank.com

***Attorneys for Ambac Assurance Corporation***

*[Remainder of Page Intentionally Omitted]*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

/s/ Roberto Cámara-Fuertes

Roberto Cámara-Fuertes (USDC-PR No. 219002)

221 Ponce de León Avenue, 5th Floor

San Juan, PR 00917

Telephone: (787) 766-7000

Facsimile: (787) 766-7001

Email: rcamara@ferraiuoli.com